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9 Financial, Inc. and Mortgage Electronic  
Registration Systems, Inc.

10  
11 UNITED STATE DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION

14 CATARINO MENDOZA, ) Case No. 3:10-cv-05792-SC  
15 Plaintiff, )  
16 v. ) STIPULATION TO FURTHER EXTEND  
17 WILMINGTON FINANCE, a business entity, ) DEADLINE OF DEFENDANTS  
form unknown; FIVE STAR INVESTMENT ) VERICREST FINANCIAL, INC. AND  
18 AND REALTY; ACADEMY ESCROW, INC., ) MORTGAGE ELECTRONIC  
a business entity, form unknown; NEW ) REGISTRATION SYSTEMS TO  
CENTURY, business entity, form unknown; ) RESPOND TO PLAINTIFF'S FIRST  
NORTH AMERICAN TITLE COMPANY, a ) AMENDED COMPLAINT  
business entity, form unknown; MORTGAGE )  
ELECTRONIC REGISTRATION SYSTEMS, )  
INC., a business entity, form unknown; ) [Local Rule 6-1]  
VERICREST FINANCIAL, a business entity, )  
form unknown, and DOES 1-100, inclusive, )  
Defendants. )  
)

1           WHEREAS:

2           1. Plaintiff Catarino Mendoza (“Plaintiff”), on the one hand, and defendants  
3 Vericrest Financial, Inc. (“Vericrest”) and Mortgage Electronic Registration Systems, Inc.  
4 (“MERS”), on the other hand, are exploring the possibility of resolution by means of a loan  
5 modification;

6           2. Pursuant to a previous stipulation approved by the Court, May 2, 2011 is the  
7 current deadline for defendants Vericrest and MERS to file and serve their respective responses  
8 to the first amended complaint (“FAC”);

9           3. A case management conference (“CMC”) is set in this matter for June 10, 2011;

10          6. Plaintiff, on the one hand, and Vericrest and MERS, on the other hand, are  
11 discussing a potential loan modification, which could result in a settlement of this matter, and are  
12 engaged in the process of collecting and evaluating the information/documents relevant to a loan  
13 modification; and

14          7. Plaintiff, on the one hand, and Vericrest and MERS, on the other hand, agree that  
15 their discussions about potential resolution of this matter would be facilitated by a further  
16 extension of the deadline for Vericrest and MERS to respond to the first amended complaint.

17           **THEREFORE:**

18           In view of the foregoing, and pursuant to Local Rule 6-1, plaintiff Catarino Mendoza and  
19 defendants Vericrest and MERS hereby stipulate that the deadline for Vericrest and MERS to file  
20 and serve their respective responses to plaintiff’s first amended complaint is extended, up to and  
21 including June 1, 2011.

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1 Dated: April 29, 2011

RUSS M. FUKANO  
ERIC L. COMPERE  
TROYGOULD PC

4 /s/ Eric L. Compere

5 By: Eric L. Compere  
6 Attorneys for Defendants Vericrest Financial,  
7 Inc. and Mortgage Electronic Registration  
8 Systems, Inc.

9 Dated: April 29, 2011

LEPERA & ASSOCIATES, PC.

11 By: /s/ Joseph A. Lepera

12 Joseph A. Lepera  
13 Attorneys for Plaintiff Catarino Mendoza



1           **ATTESTATION PURSUANT TO GENERAL ORDER NO. 45**

2           Pursuant to General Order No. 45 of the Northern District of California, I attest that  
3 concurrence in the filing of the document has been obtained from each of the other signatories to  
4 this document.

5           By: /s/ Eric L. Compere

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